

**Lila Ayers, Esq.**  
**8 East Prospect Avenue, Suite A1**  
**Mount Vernon, NY 10550**  
**(914) 699-5220**  
**[lilaayerslaw@aol.com](mailto:lilaayerslaw@aol.com)**

September 25, 2025

Via ECF

Hon. Natsha C. Merle, U.S.D.J.  
United States District Court  
Eastern District of New York

**Re: Singh v. Topline NYC Contracting Inc., et al.**  
**Case no. 1:25-CV-00776**

Dear Judge Merle:

This office represents defendants in this matter.

We are in receipt of plaintiff's letter, dated September 22, 2025 requesting a conference to make an (untimely) motion to dismiss our counterclaims.

Please be advised that due to the Rosh Hashanah holiday, key staff members of mine were off. Further, my office would like an opportunity to cross-move to dismiss all or part of the complaint if we are going down this road. I, therefore, request that this office be given until Tuesday, September 30, 2025, to submit a letter in opposition to plaintiff's letter and in support of defendants' cross motion.

Thank you for your attention to this.

Very truly yours,

*Lila Ayers*  
Lila Ayers

cc: Emanuel Kataev, Esq.